

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**IN RE: Acetaminophen – ASD-ADHD Products Liability
Litigation** Docket No. 22-md-3043 (DLC)

This Document Relates To: *All Cases*

**DECLARATION OF ASHLEY C. KELLER
IN SUPPORT OF PLAINTIFFS' REPLY IN SUPPORT OF RULE 702 MOTION TO
EXCLUDE DEFENDANTS' EXPERT DR. STEPHEN FARAOONE**

1. My name is Ashley C. Keller, and I am a partner at Keller Postman, LLC. I am Co-Lead Counsel for the Plaintiffs in this MDL. I declare under penalty of perjury that the below is true and correct.
2. Attached hereto as **Exhibit 1** is a true and correct copy of Qi Chen et al., *Maternal Pre-Pregnancy Body Mass Index and Offspring Attention Deficit Hyperactivity Disorder: A Population-Based Cohort Study Using a Sibling-Comparison Design*, 43 Int'l J. Epidemiology 83 (2014).
3. Attached hereto as **Exhibit 2** is a true and correct copy of Charlotte Skoglund et al., *Familial Confounding of the Association Between Maternal Smoking During Pregnancy and ADHD in Offspring*, 55 J. Child Psychology & Psychiatry 61 (2014).
4. Attached hereto as **Exhibit 3** is a true and correct copy of Eileen A. Curan et al., *Obstetric Mode of Delivery and Attention-Deficit/Hyperactivity Disorder: A Sibling-Matched Study*, 45 Int'l J. Epidemiology 532 (2016).
5. Attached hereto as **Exhibit 4** is a true and correct copy of Kelsey K. Wiggs et al., *A Family-Based Study of the Association Between Labor Induction and Offspring Attention-Deficit Hyperactivity Disorder and Low Academic Achievement*, 47 Behavioral Genetics 383 (2017).

6. Attached hereto as **Exhibit 5** is a true and correct copy of Paul Bryde Axelsson et al., *Investigating the Effects of Cesarean Delivery and Antibiotic Use in Early Childhood on Risk of Later Attention Deficit Hyperactivity Disorder*, 60 J. Child Psychology & Psychiatry 151 (2019).

7. Attached hereto as **Exhibit 6** is a true and correct copy of Maxim Lemelin et al., *Maternal ADHD Medication Use During Pregnancy and the Risk of ADHD in Children: Importance of Genetic Predispositions and Impact of Using a Sibling Analysis*, 44 Eur. Neuropsychopharmacology 66 (2021).

8. Attached hereto as **Exhibit 7** is a true and correct copy of Tor-Arne Hegvik et al., *Labor Epidural Analgesia and Subsequent Risk of Offspring Autism Spectrum Disorder and Attention-Deficit/Hyperactivity Disorder: A Cross-National Cohort Study of 4.5 Million Individuals and Their Siblings*, 228 Am. J. Obstetrics & Gynecology 233.e1 (2023).

9. Attached hereto as **Exhibit 8** is a true and correct copy of a demonstrative exhibit comparing a forest plot used in Dr. Faraone's deposition as Exhibit 733 and the same forest plot with additional data points.

Dated: October 20, 2023

Respectfully submitted,

KELLER POSTMAN LLC

/s/ Ashley C. Keller

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